

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1, and JANE DOE #2, on	)	
behalf of themselves and all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO: 7-21-CV-00220 - LSC
v.	)	
	)	
MG FREESITES, LTD, d/b/a	)	
“PORNHUB”, a foreign entity; MG	)	
FREESITES II LTD, a foreign entity,	)	
MINDGEEK S.A.R.L., a foreign entity;	)	
MINDGEEK USA, INCORPORATED, a	)	
Delaware corporation; MG CY	)	
HOLDINGS LTD, a foreign entity;	)	
MINDGEEK CONTENT RT LIMITED, a	)	
Foreign entity; 9219-1568 QUEBEC INC.	)	
d/b/a MINDGEEK, a foreign entity; MG	)	
BILLING LTD, a foreign entity,	)	
	)	
Defendants.		

**MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE**

Pursuant to Civil Local Rule 83.1(b), the Plaintiffs move for the admission and appearances of attorneys Kimberly Lambert Adams, Brian Dooley Kent, Gaetano Anthony D’Andrea, Jillian Patricia Roth, M. Stewart Ryan, Alexandria MacMaster, Benjamin W. Bull, Peter A. Gentala, Danielle Bianculli Pinter, Christen M. Price, Kevin D. Kent, Mark B. Schoeller, and Joseph W. Jesiolowski *pro hac vice* in this action. This motion is supported by the Declarations<sup>1</sup> filed herewith of Kimberly Lambert Adams, Brian Dooley Kent, Gaetano Anthony

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<sup>1</sup> For privacy reasons, the street number and street name of the applicant attorneys’ home addresses have been redacted. The applicants will submit unredacted home address information should the Court require.

D'Andrea, Jillian Patricia Roth, M. Stewart Ryan, Alexandria MacMaster, Benjamin W. Bull, Peter A. Gentala, Danielle Bianculli Pinter, Christen M. Price, Kevin D. Kent, Mark B. Schoeller, and Joseph W. Jesiolowski. This motion is further supported by the consent of the undersigned, Gregory Zarzaur, and Joshua P. Hayes, who agree to serve as local counsel for the attorneys admitted *pro hac vice* on behalf of the Plaintiffs in the above-styled matter.

Respectfully submitted this the 22nd day of February 2021,

/s/ Gregory Zarzaur

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*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record in this matter via the Court's CM/ECF system on this the 22nd day of February, 2021.

I hereby further certify that a copy of the foregoing will be served on the Defendants at the time service is perfected.

/s/ Gregory Zarzaur  
OF COUNSEL